



August 12, 2005

Arthur Neal, Director, Program Administration
National Organic Program
USDA-AMS-TMP-NOP
1400 Independence Avenue, SW, Room 4008
So. Ag Stop 0268
Washington, DC 20250

RE: USDA, Agricultural Marketing Service Docket Number TM-04-07

Dear Mr. Neal,

The following comments are in reference to USDA, Agricultural Marketing Service Docket Number TM-04-07 concerning 7 CFR Part 205, National Organic Program Sunset Review process.

GloryBee Foods, Inc. thanks the United States Department of Agriculture and the National Organic Standards Board for the opportunity to comment on the Sunset Review of the 2002 National List. We support the list as published, and would like to especially support the following material(s):

The following substances are found in National List Section 205.605 Nonagricultural (nonorganic) substances allowed as ingredients in or on processed products labeled as "organic" or "made with organic (specific ingredients or food group(s))."

<u>Substance:</u>	<u>Use:</u>	<u>Reason to retain on the National List:</u>
Citric Acid	preservative	only substance available to sustain product shelf life
Potassium Carbonate	alkalizing agent	unique flavor and processing characteristics
Flavors, non-synthetic	flavor	only option for flavoring our organic honeys
Chlorine materials	cleaning	Cost efficient use for preventing contamination

GloryBee foods, Inc. also markets and distributes products for use in client organic production. We therefore are also concerned as to how removal of the following products from the National List would affect our clients, and our ability to provide appropriate ingredients:

www.GloryBeeFoods.com
120 N Seneca Road
Post Office Box 2744
Eugene, OR 97402 USA



Sales Fax: (541) 689-2007
Office Fax: (541) 689-9692
Phone: (541) 689-0913
Toll Free: (800) 456-7923



Substance found in section 205.605:

Acids
Flavors, nonsynthetic
Sodium bicarbonate
Sodium carbonate
Tartaric acid
Waxes, nonsynthetic
Yeast, nonsynthetic
Ascorbic acid
Ethylene
Glycerin
Lecithin, bleached
Nutrients, vitamins and minerals
Phosphoric acid

Substances found in section 205.606:

Cornstarch, native
Gums, water-extracted
Lecithin, unbleached
Pectin, high – methoxy

Please accept this submittal for consideration in your Agricultural Marketing Service Docket Number TM-04-07, 7 CFR Part 205, National Organic Program Sunset Review process. GloryBee Foods appreciates the time investment taken by the USDA to re-evaluate ingredients, and their appropriateness to the National List.

Sincerely,



Jamie Bell
Quality Assurance Manager

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